

BUSH ROSS, P.A.
Jeffrey W. Warren
1801 N. Highland Avenue
Tampa, Florida 33602
Telephone: (813) 224-9255
Facsimile: (813) 223-9620

*Special Florida Litigation Conflicts Counsel
to the Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**SUPPLEMENTAL DECLARATION OF JEFFREY W. WARREN
IN SUPPORT OF THE FINAL APPLICATION OF BUSH ROSS, P.A.
AS SPECIAL FLORIDA LITIGATION CONFLICTS COUNSEL FOR
THE DEBTORS FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FOR THE PERIOD FROM OCTOBER 28, 2016 THROUGH MARCH 17, 2017**

I, Jeffrey W. Warren, being duly sworn, state the following under penalty of perjury:

1. I am a partner and currently President of the law firm of Bush Ross, P.A. (“**Bush Ross**”), located at 1801 N. Highland Avenue. Tampa, FL 33602. Bush Ross served as special Florida litigation conflicts counsel to the debtors and debtors in possession (collectively, the “**Debtors**”) in these proceedings.

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

2. On May 16, 2017, Bush Ross filed its final fee application in connection with its representation of the Debtors.

3. The following is provided in response to the request for additional information set forth in Section C.5 of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, adopted on June 11, 2013 (the “UST Guidelines”):

Question: Did you agree to any variations from, or alternatives to your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: Before Bush Ross began significant work in the actions for which it was engaged and had submitted for the Debtors’ approval an actual budget regarding the expected work in the state courts in Florida, Bush Ross was advised that substantial settlement progress was being made and that significant work by it was no longer expected to be necessary. Accordingly, the expense of completing and submitting a budget was avoided and there was never a budget from Bush Ross for comparison purposes.

Question: Have any of the professionals included in this fee application varied their hourly rates based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? If so, please quantify by hours and fees.

Response: Yes. Bush Ross estimates that less than three hours of time and fees of \$350.00 were spent reviewing and revising time records and preparing a monthly statement in accordance with *Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* (Docket No. 94). This time was primarily spent to ensure the preservation of privilege and work product and provide sufficient time entry detail so as to satisfy the UST Guidelines and a review by the Court, the U.S. Trustee, and third parties.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: Does this fee application include rate increases since retention?

Response: No.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 9, 2017
Tampa, Florida

/s/ Jeffrey W. Warren
Jeffrey W. Warren
*Special Florida Litigation Conflicts Counsel
to the Debtors and Debtors in Possession*